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May 27, 1987

Ellen Teplitzky, Esquire
United States Environmental Protection Agency
Region III
841 Chestnut Street
8th Floor
Philadelphia, PA 19107

Re: In the Matter of U.S. Metal and Coin
and Jewelry Company

Dear Ellen:

On behalf of our client, U.S. Metal and Coin and Jewelry Company, we have tried in earnest to arrive at a consent agreement and order with EPA and the City. We received your proposed draft on Monday, May 18, 1987. On May 21st we returned a revised draft for your review. On Friday, May 22nd, you met with Ralph Jacobs to discuss the issues. Ralph Jacobs tried, without success, to reach you on the following Tuesday, May 26th, to discuss the unresolved matters. Today, May 27th, in a shift from your prior willingness to negotiate an agreement, you have informed me that EPA will issue a unilateral order in lieu of a negotiated consent agreement and order.

We have tried to negotiate a consent agreement as expeditiously as possible given the involvement of three parties and complex issues of cleanup and potential liability of our client. We still wish to arrive at a negotiated agreement, and respectfully request that EPA refrain from issuing a unilateral order until we have been given a reasonable time, at least 24 hours, to review your latest proposed draft which we have not seen. In the meantime, Weston Consultants are in the process of cleaning up the 735 Sansom Street property and Brenda Ronco's studio. I reiterate our desire to resolve the outstanding issues amicably and, in view of the history of this matter, give us at least one working day to review your position with our client.

Please do not hesitate to call if you have any questions.

Sincerely yours,

Adam G. Garson

For HOYLE, MORRIS & KERR

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AGG/lc